

## **REMARKS**

Claims 1 – 24 were pending in the present application. Claims 1, 5-8, 11, 15, 22 and 24 have been amended. Claims 3, 10, and 14 have been cancelled. Claims 1 - 2, 4-9, 11-13, 15-24 remain pending in the present application.

Claim 22 is rejected under 35 U.S.C. 112 for lacking proper antecedent basis. Applicant has amended Claim 22 to overcome the rejection.

Claims 1, 4 and 5 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lee et al. (U.S. Patent 6,564,219, hereinafter ‘Lee’). Claims 2-3 were rejected under U.S.C. 103(a) as being unpatentable over Lee in view of Amatsu et. al. (U.S. Patent 5,471,615, hereinafter ‘Amatsu’). Applicant respectfully traverses these rejections, but has nevertheless amended Claims 1 and 5 and canceled Claim 3.

Lee discloses an application programming interface allowing changes to a logical objects on a host computer to be identified based on physical changes in a storage device (Col. 3, lines 26-29). In addition, Lee discloses a method of determining changes to a logical object subsequent to a reference time (Col. 3, lines 33 – 35).

Amatsu discloses a distributed data processing system in which two computers, each running under a different operating system, are coupled so that jobs initiated by a first one of the computers can be executed on a second computer by using the resources of the second computer (Abstract). Amatsu also discloses a system architecture providing a means for file sharing between operating systems with fundamentally differing file systems (Col. 4, lines 14 – 16).

Applicant can find no teaching or suggestion in Lee or Amatsu, taken singly or in combination, of “accessing a storage device housing a storage object in a first storage environment from a second storage environment, requesting a map and one or more

extents for the storage object from a second storage environment, and using the map and the one or more extents to access a storage device housing the storage object from the second storage environment”, as recited in amended Claim 1. Accordingly, Claim 1 is believed to patentably distinguish over Lee and Amatsu.

In fact, instead of teaching or suggesting the feature of “accessing a storage device housing the storage object from the second storage environment”, as recited in amended Claim 1, Amatsu specifically teaches the front-end computer providing I/O services for the back-end computer: “All input/output operations, user interface, job management, data management, and other back-end computer related services are provided for the back-end computer by the front-end computer. All I/O requests to these data sets in the DASDs during a back-end computer program execution are routed to the front-end computer through the HPPI for data management service. (Col. 7, lines 1-9)”. Thus, Amatsu actually teaches away from the features recited in amended Claim 1.

For at least the reasons cited above, Applicant respectfully submits that amended Claim 1 and its dependent Claims 2, 4 and 5 patentably distinguish over Lee and Amatsu by the Examiner.

The Examiner rejected Claims 6-13 and 15-23 under U.S.C. 103(a) as being unpatentable over Lee in view of Field et. al. (U.S. Patent 6,253,324, hereinafter ‘Field’). Field discloses a method of verifying the integrity of client programs that request services from server programs (Abstract). A storage server provides services to requesting client programs (Col. 5, lines 16-17). Generally, the storage server receives data items from client programs, securely stores and/or encrypts the data items, and returns such data items in response to requests from authorized client programs (Col. 5, lines 17-21). The storage server also performs authentication and verification procedures (Col. 5, lines 21-24). A dynamically linked library (DLL) is provided that can be executed in the application programs’ address space to exploit the full functionality of the storage server (Col. 5, lines 34-41). Applicant can find no teaching or suggestion in Lee or Field, taken singly or in combination, of “using a map and one or more extents of a storage object

housed in a first storage environment to access a storage device from a second storage environment”, as recited in amended Claim 1. As Claims 6-7 depend upon Claim 1, Applicant respectfully submits that Claims 6-7 patentably distinguish over Lee and Field.

As to Claim 8, Applicant can find no teaching or suggestion in Lee or Field, taken singly or in combination, of “an assign configuration identifier module operable to notify a client module in a second storage environment when a persistent data structure is modified, a retrieve extent module operable to provide one or more extents associated with the storage object to the client module, wherein the client module is configured to use the persistent data structure and the one or more extents to access a storage device housing the storage object from the second storage environment”, as recited in amended independent Claim 8. Claim 8 and its dependent Claims 9 and 11 – 13 are therefore also believed to patentably distinguish over Lee and Field.

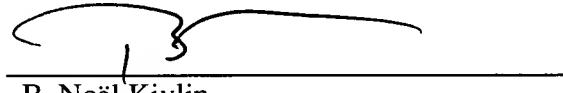
Independent Claims 15 and 22 have also been amended to include limitations similar to those discussed above. The Examiner rejected Claims 14 and 24 as being unpatentable under U.S.C. 103(a) over Lee in view of Field, further in view of Amatsu. In view of the amendments to independent Claims 15 and 22, and for at least the reasons cited above, Applicant believes that Claims 15-24 also patentably distinguish over the art cited by the Examiner.

## CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-16900/BNK.

Respectfully submitted,



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